Case 08-35653-KRH

Doc 4955

Filed 09/15/09

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U.S. BANKHUPTCY COURT

UNITED STATES BANKRUPTCY COURT RICHMOND DIVISION

IN RE:

CHAPTER 11

CIRCUIT CITY STORES, INC., et al

CASE NO. 08-35653 (KRH)

Debtors

(Jointly Administered)

OPPOSITION TO MOTION

MAY IT PLEASE THE COURT:

Patty Burrell objects to the motion filed herein for the following:

Her claim is unliquidated and contingent but because of the automatic stay, she has been unable to pursue it in state court here in Louisiana. She has limited funds and is unable to hire an attorney to represent her in the State of Virginia for the purpose of filing this opposition. She also does not have the funds or wherewithal in order to be able to travel to Virginia to file an opposition. The attorney she has in Baton Rouge, Louisiana, is not licensed to practice in Virginia and has undertaken his representation of her in Louisiana on a contingency basis. It is unjust and inequitable to force her to have to go to Virginia to make this opposition.

Circuit City chose to do business in the State of Louisiana, the accident occurred in the State of Louisiana, and all of the witnesses pertaining to the accident are in the State of Louisiana. It is deprivation of her "due process" rights to force her to go to Virginia in order to preserve her claim for reimbursement for the damages caused by Circuit City in Louisiana.

Respectifully submitted by:

September 14, 2009

Clerk of Court U.S. Bankruptcy Court 701 East Broad Street, Suite 4000 Richmond, Virginia 23219

RE: In re Circuit City Stores, Inc. et al; Case No.: 08-35653 (KRH) (Jointly Administered); Chapter 11; United States Bankruptcy Court for the Eastern District of Virginia; Richmond

Division

Dear Sir:

Enclosed please find my opposition to the motion that was filed in the above bankruptcy matter.

Thank you.

Yours very truly,

Durrell

Patty Burrell

Enclosure



ll...||ll...|..||ll...||ll...|| Patty Burrell 2070 Silverside Drive, Suite 1-B Baton Rouge, Louisiana 70808